

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**NATIONAL GRANGE MUTUAL  
INSURANCE COMPANY, as subrogee Of  
ENGINEERING DESIGN ASSOCIATES**

Plaintiff,

v

**CITY OF SPRINGFIELD and  
SPRINGFIELD WATER AND  
SEWER COMMISSION**

Defendants

Civil Action No. 04-30199-KPN

**MOTION TO EXTEND TIME FOR DISCOVERY**

Now come the Defendants, City of Springfield and the Springfield Water and Sewer Commission, and move this Honorable court to extend time to conduct discovery from July 15, 2005 up to and including September 1, 2005.

As grounds therefore, the Defendant Springfield Water and Sewer Commission, through counsel would state that Plaintiff's counsel has sent written discovery requests that involve researching archives in two separate locations. The Defendant, Springfield Water and Sewer Commission, has compiled a number of documents to date but due to vacation schedules will not have all requested information prior to July 15, 2005. The Plaintiff, through counsel desire to depose a number of witnesses of both defendants but has appropriately requested that the initial discovery requests be compiled first.

The Plaintiff's counsel has consented to this request.

**THE DEFENDANTS**

**CITY OF SPRINGFIELD and  
SPRINGFIELD WATER AND  
SEWER COMMISSION**

**ASSENTED TO**

By: 

Sean P. O'Donnell, Esq.  
Cozen O'Connor  
1900 Market Street  
Philadelphia, PA 19103  
Telephone 215-665-2000  
Telefax 215-665-2013

By: 

John T. Liebel, Esq.  
City of Springfield  
Law Department  
36 Court Street  
Springfield, MA 01103  
Telephone (413) 787-6085  
Telefax (413) 787-6173  
BBO # 299660

**CERTIFICATE OF SERVICE**

To:

John F. Burke Jr.  
1500 Main Street, Suite 2400  
P.O. Box 15387  
Springfield, MA 01115-5387

Sean P. O'Donnell, Esq.  
Cozen O'Connor  
1900 Market Street  
Philadelphia, PA 19103

I, John T. Liebel, hereby certify that I caused a copy of the foregoing document to be delivered to the above named on this 7<sup>th</sup> day of July, 2005.

  
John T. Liebel, Esq.